

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust  
Litigation, MDL 2817*

No. 1:18-CV-864

*This document relates to:*

Hon. Robert M. Dow, Jr.

*Authenticom, Inc. v. CDK Global, LLC et al.,  
Case No. 1:18-cv-00868 (N.D. Ill.)*

Magistrate Judge Jeffrey T. Gilbert

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**DEFENDANTS' MOTION TO COMPEL PLAINTIFF AUTHENTICOM TO  
PRODUCE THIRD-PARTY COMMUNICATIONS OR, IN THE ALTERNATIVE,  
SUBMIT SUCH COMMUNICATIONS FOR IN CAMERA REVIEW**

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Defendants the Reynolds & Reynolds Company and CDK Global, LLC respectfully move this Court to compel Plaintiff Authenticom to produce third-party communications that it has improperly withheld. In the alternative, Defendants request that the Court compel Authenticom to submit such documents for *in camera* review. In support of this motion, Defendants incorporate by reference the memorandum of law and exhibits filed concurrently herewith and any oral argument that the Court may allow at a hearing on this Motion.

Pursuant to Local Rule 37.2, Defendants certify that they have met and conferred with counsel for Plaintiff Authenticom in a good faith attempt to resolve the disputes presented by this Motion. In particular, Defendants met and conferred on November 18, 2019, January 23, 2019, and February 21, 2019, and exchanged correspondence on these issues numerous times, including on November 16, 2018, January 7, 2019, January 18, 2019, and February 25, 2019.

Dated: March 1, 2019

Respectfully submitted,

/s/ Britt M. Miller

Britt M. Miller

Matthew D. Provance

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/s/ Aundrea K. Gulley

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**CERTIFICATE OF SERVICE**

I, Aundrea Gulley, an attorney, hereby certify that on March 1, 2019, I caused a true and correct copy of the foregoing DEFENDANTS' MOTION TO COMPEL PLAINTIFF AUTHENTICOM TO PRODUCE THIRD-PARTY COMMUNICATIONS OR, IN THE ALTERNATIVE, SUBMIT SUCH COMMUNICATIONS FOR IN CAMERA REVIEW, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Aundrea Gulley

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